SITE EMERGENCY RESPONSE PLAN

FOR

VIM Recycling, Incorporated

29861 Old US Highway 33 Elkhart, Indiana 46516

PRELIMINARY DRAFT FOR EPA REVIEW JULY 20, 2009

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INTRODUCTION

This Site Emergency Response Plan was developed to comply with a U.S. EPA Administrative Consent Order #EPA-5-09-113(a)-IN-05, dated June 29, 2009. One component of the Administrative Consent Order (ACO) involves development of a Site Emergency Plan for the removal project. Specifically, the Order states the following:

Paragraph 52. Respondents shall develop a contingency plan for possible emergencies (Site Emergency Plan) which may occur during the project in coordination with the local fire department, EPA and IDEM.

Paragraph 53. The Site Emergency Plan shall outline current site layout and conditions, site access, available local firefighting or emergency response resources, directions to the nearest hospitals, inventory of site equipment, contingency plans in the event of a fire, release or explosion, and emergency contact information for all company, local, state and federal emergency responders.

Paragraph 54. A draft Emergency Response Plan shall be submitted to EPA within fourteen (14) days of the signature of this Order.

Paragraph 55. Respondents shall implement the Site Emergency Plan upon submittal to EPA.

This plan outlines emergency activities that will be taken to minimize the threat to the human health and the environment in the event of an incident. The plan was developed utilizing information from site files, U.S. EPA, the Indiana Department of Environmental Management (IDEM), the Baugo Fire Department, and the Elkhart County Emergency Management Agency. Representatives from these organizations met at the facility in June 2009 to tour the site and provide input and suggestions, which have been incorporated into this document.

OSHA regulations (1910.120) require training for personnel who deal with emergency response operations for releases of hazardous substances. According to the regulations in 29 CFR 1910.120(a)(3), responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel, are not considered to be emergency responses within the scope of the regulation. The spills that might occur in the normal day-to-day operations of the facility, and for which employee is equipped to deal with, will be dealt with without disruption of normal operations. This may involve a spill in the employee's regular work area in quantities that the employee would normally deal with, using equipment and safety gear this readily available and used as part of the employee's normal duties. The assumption is that the employee has received the training in the proper handling of the hazardous chemicals in his or her area as part of the Hazard Communication training required for their job.

What constitutes an incidental spill in each area must be determined so personnel in each area know if a spill should be cleaned up, or if the Emergency Coordinator needs to be contacted and the Site Emergency Response Plan activated.

Training has not been provided for VIM Recycling, Inc. employees to perform the cleanup of large or "significant" spills. Employees should understand that in the case of significant spill, their use of this plan is to activate the Site Emergency Response Plan so that trained personnel can be summoned to conduct the cleanup.

VIM Recycling, Inc. has determined that, should a large scale incident occur, it will contract with organizations with the proper training and equipment for emergency response and corrective action activities. The information provided in this plan is not intended to serve as training in Hazardous Materials Response techniques. Because of the training requirements in the OSHA HAZWOPER (1910.120) regulation, only plant personnel who have received the proper training are authorized to clean up any release other than and "incidental release".



1.0 FACILITY IDENTIFICATION AND GENERAL INFORMATION

Facility Name: VIM Recycling, Inc.

Facility Address: 29861 Old US Highway 33

Elkhart, Indiana 46516 State County: Elkhart Latitude: N 41 40' 2" Longitude: W 86 2' 17"

U.S. EPA Identification Number:

Primary Emergency Coordinator: Kenneth Will

President

Office Telephone Number: (574) 642-3677 Home Address: 22907 S.R. 120 East

Elkhart, Indiana 46516

Home Telephone Number: (574) 522-8553

Cell Phone Number: (574) 320-6315

Type of Facility: The VIM Recycling, Inc. plant (see Appendix A for a Site Plan) is a recycling center that accepts, stores, sorts, screens, grinds, blends and colorizes various wood materials. The wood chips are sold into various markets, including landscaping, animal bedding, hog fuel and manufactured soils.

No hazardous materials are used in VIM's processes and no hazardous wastes are generated by this facility.

Description of Generator Activities:

Hazardous wastes are not normally generated by VIM. Wastes such as used oil and antifreeze are accumulated on site at satellite accumulation areas in 55-gallon containers before either being picked up for processing on an as needed basis. All spent fluids are shipped to permitted treatment/disposal facilities by licensed transporters.



2.0 EMERGENCY COORDINATORS

The Primary Coordinator is Kenneth Will, President. The facility occasionally operates evenings and weekends. A decision was made to identify alternate coordinators for maximum coverage.

Primary Emergency Coordinator:

Kenneth Will President

Home Address: 22907 S.R. 120 East

Elkhart, Indiana 46516

Office Telephone Number: (574) 642-3677 Home Telephone Number: (574) 522-8553 Cell Phone Number: (574) 320-6315 Nextel Radio Number: 111*44*36315

Alternate Coordinator #1:

Laural Nissley

Maintenance Director

Home Address: 63895-1 County Road 11

Goshen, Indiana 46526

Home Telephone Number: (574) 862-1378 Office Telephone Number: (574) 642-3677 Cell Phone Number: (574) 320-0262

Nextel Radio Number: (374) 320-0202

Alternate Coordinator #2:

Jose Molina

Assistant Plant Manager

Home Address: 1311 Mintcrest Drive

Goshen, Indiana 46526

Home Telephone Number: (574) 302-3564 Office Telephone Number: (574) 642-3677

Cell Phone Number: (574) 320-2234 Nextel Radio Number: 111*44*23903

2.1 Duties of Emergency Coordinator(s)

The duties of individuals acting as Emergency Coordinator are outlined below.

- A) Whenever there is an imminent or actual emergency situation, the emergency coordinator must immediately:
 - 1) Activate internal facility communication systems to notify facility personnel of the situation; and
 - 2) Notify the local and State agencies with designated response roles (i.e., coordination agreements) if help is needed.
- B) Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and a real extent of any released materials. This may be done through observation or review of facility records or manifests.
- C) The emergency coordinator must access possible hazards to the human health or the environment that may result from the release, fire, or explosion (e.g., of any toxic, irritating, or asphyxiating gases that are generated, or the effluents of any hazardous surface run-off water or chemical agents used to control fire or heated-induced explosions.)
- D) If the emergency coordinator determines that the facility has had a release, fire or explosion which could threaten human health or the environment outside the facility, he must report findings as follows:
 - 1) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and
 - 2) He must immediately notify either the government officials designated as the on-scene coordinator or the National Response Center at 1-800-424-8802. The report must include:
 - a) Name and telephone number of reporter;
 - b) Name and address of facility;
 - c) Time and type of incident (e.g., release, fire or explosion);
 - d) Name and quantity of materials involved to the extent known;
 - e) The extent of injuries, if any; and
 - f) The possible hazards to human health or the environment, outside the facility.

- E) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous materials or waste at the facility. These measures include, where applicable, stopping processes and operations, collecting and containing released materials and/or waste, and removing or isolating containers.
- F) If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, other equipment, wherever this is appropriate.
- G) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, any other material that results from a release, fire, or explosion at the facility.
- H) The emergency coordinator must ensure that, in the affected area(s) of the facility:
 - 1) No waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are completed: and
 - 2) All emergency equipment listed in the contingency plan is replaced, cleaned and fit for its intended use before operations are resumed.

In general, action required by Emergency Coordinator can be summarized as follows: He must determine that a release has occurred; identify the spilled material; account for human safety; determine if the spill is significant or insignificant for both human safety and environmental protection, notify the proper emergency response personnel and return the facility to a steady state. If the spill is insignificant, use the proper PPE and materials to manage and clean up the spill and if the spill is significant, go on to Section 4 of this plan.

2.1 Authority to Commit Resources

To ensure that the protection of the human health and the environment is maintained, Mr. Kenneth Will – President, and Laural Nissley - Maintenance Manager have been apprised of the regulations and have given authority to the aforementioned emergency coordinators to expend funds in the event of an incident at the facility.

The individuals identified as either the Primary or Alternate Coordinators are management personnel. They are thoroughly familiar with the Site Emergency Response Plan, operations and activities at the facility, characteristics of waste handled, the location of records within the facility as well as the layout of the facility.

3.0 IMPLEMENTATION OF THE SITE EMERGENCY RESPONSE PLAN

The Site Emergency Response Plan will be implemented if an incident (e.g., spill, fire, explosion) might threaten human health or the environment. The emergency coordinator has the authority to make this decision.

This Site Emergency Response Plan is designed to provide actions needed, commit necessary resources for the entire facility and operations to protect human health and the environment. The Site Emergency Response Plan must be implemented whenever there is an incident involving hazardous materials outside of the building or when the released material might migrate out of the building onto the soil. The degree of the seriousness regarding the incident will depend on the type, amount and location of the material involved in the incident. Outlined below are potential emergencies that might require implementation of the Site Emergency Response Plan.

3.1 Spills

☐ The spill from the loading or unloading of colorants, solvents, petroleum products or other hazardous liquids which was contained within the property boundaries, but the material came in contact with soil that could leach into the groundwater causing aquifer contamination.
☐ The spill from the rupture of a fuel or hydraulic line in the heavy equipment on site which was contained within the property boundaries, but the material came in contact with soil that could leach into the groundwater causing aquifer contamination.
☐ A spill that could not be contained within the facility, or on company property resulting on off-site soil contamination and/or ground or surface water contamination (i.e., migration into storm drains and manholes.
☐ A waste container's integrity has been compromised and the containment of the released material would be beyond the level of training, equipment and personnel at the site.
$\ \square$ A spill of hazardous material or hazardous waste containing a chemical that has a Reportable Quantity (RQ) under CERCLA.
Spills on site will be addressed by placement of an absorbent, such as sawdust or soil, on the affected area. The absorbent will then be collected and placed into a container for proper transport to an acceptable waste management facility, depending on the characteristics of the resulting material.
3.2 Fires
\square A fire which could cause the release of fumes from waste.

☐ A fire that if allowed to spread could ignite other materials or cause heat induced explosions.
\Box A fire that could spread to off-site areas.
☐ A fire from either inside the plant or from surrounding properties which could ignite other materials or cause heat induced explosions.
A concern regarding a fire at the facility is the use of water or chemical fire suppressants that could result in contaminated run-off and potentially contaminate the groundwater. VIM Recycling, Inc. will rely on Baugo Fire Department for fire emergencies that exceed the internal capabilities of plant personnel. (i.e., small, incidental fires). By relying upon the outside fire department, VIM Recycling, Inc. believes that this best protects the human health of the employees, surrounding community and the environment.
VIM's employees are trained in the operation of hand held fire extinguishers, which are staged at fire hydrant stations located on the site as well as within the cabs of all heavy equipment. In addition, VIM employees are trained in the use of heavy equipment which can be utilized to move inert soil materials for placement on any fires. All employees have been instructed to notify their supervisor in the event of any fire in their work area.
3.3 Explosions
VIM Recycling, Inc. employees have been instructed to notify personnel in the immediate area and a supervisor in the event of one of the following situations:
\Box An imminent danger exists that an explosion could occur, resulting in a safety hazard due to flying debris.
\Box An imminent danger exists that an explosion could ignite other waste at the facility or nearby areas.
☐ An imminent danger that an explosion involving waste could result in the release of toxic material(s).
☐ An explosion has occurred at the facility.

4.0 EMERGENCY RESPONSE PROCEDURES FOR SPILLS, FIRES, AND EXPLOSIONS

Outlined below are the actions for personnel that may be involved in an incident involving waste that could require implementation of the Site Emergency Response Plan.

4.1 DISCOVERER'S PLAN OF ACTION

If an emergency situation develops involving a hazardous material or waste, the person that discovered the release, fire or emergency situation is to notify personnel working in the area and then contact a supervisor. This person should provide the supervisor with the following information:

- a) Your name;
- b) Location of emergency;
- c) If any injuries have occurred;
- d) Types of hazardous materials or waste involved;
- e) Extent of damage or danger; and
- f) If the hazardous material or waste has migrated out of the building.

This person is then to return to the scene of the emergency (at a safe distance) and wait for the supervisor to arrive.

4.2 SUPERVISOR'S PLAN OF ACTION

Anyone, (i.e., discoverer) upon notification of an emergency situation involving hazardous material or waste, should provide the supervisor with the following information:

- a) Caller's name;
- b) Location of emergency;
- c) If any injuries have occurred;
- d) Types of hazardous materials or waste involved;
- e) Extent of damage or danger;
- f) If the hazardous material or waste has migrated out of the building; and
- g) Extent of damage or danger.

The supervisor is to evaluate the situation, and determine if it requires implementation of the Site Emergency Response Plan or can the situation be managed internally. Internal response will be limited to "incidental" releases/spills. The supervisor must assess human and/or environmental hazards to determine the next course of action. The supervisor will then immediately notify the company President.

The supervisor will describe the incident and the corrective actions taken, including the amount of clean up material generated. Generally, fires, explosions or significant spills mandate the implementation of the Site Emergency Response Plan.

If the supervisor is unsure of the situation he is not to delay and contact an Emergency Coordinator for assistance. Emergency Coordinators are listed in on page 8. The Site Manager is the Primary Emergency Coordinator and should be contacted first. If he is not available, an Alternate Emergency Coordinator should be called (in the order listed) until someone is reached.

4.2.1 INJURY AND AMBULANCE PROCEDURES

If ambulance service is summoned;

- 1. Call main trailer, inform them of ambulance dispatch and request that they open the main gate (**code 6633**). When the gate code changes, Chief Timothy Graves receives written notification.
- 2. Deploy facility personnel to SOUTH gate, the main gate that the ambulance should enter, and any major direction change point.
- 3. Escort ambulance to location of injured person(s).

4.3 EMERGENCY COORDINATOR'S PLAN OF ACTION

The emergency coordinator is to determine if outside assistance is needed and then contact the Baugo Fire Department and Elkhart City Police Department, if necessary. These organizations can be activated with a single 911 call. When further assistance with cleanup and containment is required, contact SunPro, 23765 County Road 6, Elkhart, Indiana at (574) 262-3556.

Additional agencies to be contacted are listed in Appendix B.

The emergency coordinator has to take the appropriate actions to ensure that the fire, explosion, or spill does not occur, recur, or spread into other areas.

If a material has exceeded its reportable quantity or entered a sewer or storm water drain then, the emergency coordinator must contact the following organizations:

- 1) National Response Center at 1-800-424-8802 (If RQ is exceeded);
- 2) Indiana Department of Environmental Management Emergency Response Branch at 1-888-233-7745;
- 3) Elkhart County Emergency Management Agency at 1-574-535-6590;

If a material has been released and has not exceeded its reportable quantity, but crossed the facility boundaries and contacted the soils adjoining the property, then the emergency coordinator must contact the following organizations:

- 1) Indiana Department of Environmental Management Emergency Response Branch at 1-888-233-7745;
- 2) Elkhart County Emergency Management Agency at 1-574-535-6590;
- 3) Elkhart County Local Emergency Planning Committee at 1-574-293-8931

If calls are required, it is important that he caller document the time, date, and persons at the agencies receiving the information. To ensure proper documentation; a regulatory notification form which is to be used when contacting the various agencies regarding a incident at the VIM Recycling, Inc. facility can be found in Appendix D.

Immediately after the emergency is over, the emergency coordinator must ensure that the following is done:

- A) All emergency equipment used is cleaned up and fit for their intended use before operations are resumed.
- B) Submit a written report to IDEM regarding the emergency incident involving hazardous materials or waste. The reporting requirements are identified in Section 10 on page 23.
- C) For internal evaluation of the effectiveness of the Site Emergency Response Plan procedures, the parties involved in the incident are to be interviewed by the Emergency Coordinator, who will oversee the correction of any deficiencies discovered in the Plan as a result of the response.

5.0 EMERGENCY EQUIPMENT

Communication Capabilities

The VIM Recycling, Inc. facility is equipped with a Nextel direct connect radios that will be used to alert plant personnel of the emergency situation and instruction regarding plan evacuation. The facility is equipped with a telephone system in the front office that is capable of contacting outside agencies.

Fire Control Equipment

For rapid response to fires, wall-mounted, hand held fire extinguishers are located throughout the plant, maintenance shops, attached to all heavy equipment, and at satellite fire hydrant areas located throughout the property. All fire extinguishers at Type ABC and are maintained and serviced by Fire Safety, Inc. 4605 Lincoln Way East, Mishawaka, Indiana 46544 at (574) 674-0910.

Capabilities: Respond to small fires.

Spill Control Equipment

Standard procedure on site is to use screened woodchips or sawdust material stockpiled on site on any spill areas. This material is very absorbent and equipment is readily available to clean up and absorb the spilled chemicals.

Capabilities: Response, containment, and clean up of routinely handled spilled chemical.

Personnel Protection Equipment

The front office maintains gloves and boots (e.g., rubber, latex) as well as Tyvek suits for personnel to use for the clean up of incidental releases. Company policy during the EPA project requires Level D protection for all employees involved in the project (hard hat, steel toed boots, reflective vests, safety glasses, gloves). All visitors must utilize the same PPE.

Capabilities: Provide protection to personnel during the clean up of incidental spills.

First Aid Kits

Two (2) first aid stations w. kits are located at two locations in the facility. One is located inside the garage door on the northeast corner of the main plant building and the other is located in the main office trailer at the main entrance.

Capabilities: These first aid stations are stocked with articles for the treatment of minor injuries.

All aforementioned emergency equipment is inspected and maintained on a scheduled basis by either on-site personnel or outside agencies.

6.0 COORDINATION AGREEMENTS

VIM Recycling, Inc. recognizes the Baugo Fire Department (FD) as the lead agency responding to emergencies at this facility because of their knowledge and equipment. Baugo FD has mutual aid agreements with surrounding fire departments which are kept on file at the Baugo FD. The Baugo FD will be given a copy of the Site Emergency Response Plan from VIM Recycling, Inc., as was agreed between VIM Recycling, Inc. and Chief Timothy Graves of the Baugo FD.

The fire department has been advised of the types of chemicals and products, types of waste, the amounts onsite and storage locations. The fire department will remain in the lead responding capacity until such time a fire department officials relinquishes command to another qualified individual. The Baugo FD works with the Elkhart City Fire Department, which is the Local Hazardous Material and Emergency Response Team.

The local Police department will be utilized for crowd control, security and evacuation assistance. The lead contact for the Police department is Baugo Fire Chief Timothy Graves. The Director of the Elkhart Police Department will be notified if additional assistance is needed during a response. The Police Chief will be advised of the types of waste, the amounts onsite and chemical storage locations. A copy of the Site Emergency Response Plan will be provided for distribution to the Elkhart City Police Department.

The Elkhart General Hospital will be advised of the types of chemicals and products that are handled and stored at the facility so that they can plan for the types of injuries that may occur from an incident.

As a special note: Persons injured by exposure to any chemical will be decontaminated at the facility prior to being transported to the hospital. An MSDS of the chemical(s) the injured was exposed to will also be transported with the victim.

Local Ambulance or Medical service (EMS) personnel will be summoned to transport injured personnel to the hospital and provided onsite triage if necessary. The lead contact for the EMS is the Baugo Fire Department. A copy of the Site Emergency Response Plan will be provided to the Fire Chief for distribution to the EMS staff.

The Elkhart County Emergency Management Agency will be notified of a fire, spill, or release of hazardous materials (including hazardous waste) pursuant to applicable local regulations requiring notifications for these types of incidents.

The State Emergency Response Agency (IDEM) will be notified of the release of hazardous materials and waste in accordance with 327 IAC 2.6.1.

Private emergency response and clean-up contractors will be provided a copy of the contingency plan and will be advised on the types, the amount and locations of waste, hazardous materials and petroleum products.

Copies of the plan will be sent to the following people to familiarize them with VIM Recycling, Inc. operations:

Chief Timothy Graves
Baugo Fire Department
57955 County Road 3
Elkhart, Indiana 46517
(574) 293-0780
Tgraves_BTVFD@comcast.net

Tony Hartman, Director Elkhart General Hospital 600 East Boulevard Elkhart, Indiana 46514 (574) 294-2621

Mr. John Bamber SunPro Services 23765 County Road 6 Elkhart, Indiana 46514 (574) 262-3556

Jennifer Tobey
Elkhart County Emergency Management Agency
117 N. 2nd Street
Goshen, Indiana 46526
(574) 535-6590
emergencymangt@elkartcounty.com

Chas Taylor Elkhart City Fire Department Hazardous Materials Team 500 East Street Elkhart, Indiana 46514 (574) 293-8931

John Hulewicz Elkhart County Health Department Environmental Health Division 4230 Elkhart Road Goshen, Indiana 46526 (574) 875-3391 Kim Davis General Manager Elkhart County Landfill 59530 County Road 7 South Elkhart, Indiana 46517 (574) 522-2581



7.0 EVACUATION PLAN

The evacuation of the VIM Recycling, Inc. facility will be conducted in the event the Emergency Coordinator decides that their personnel safety is in danger. The Emergency Coordinator can call for the evacuation of the entire plant or specific work areas. The evacuation routes are specific to each area. The evacuation map is found in Appendix A.

Facility personnel have been instructed to immediately shut down the equipment and proceed to the primary exit route for their work area. If the call for evacuation identifies a primary route as being blocked or in the incident area, the employees are to use alternate evacuation route. Once outside of the facility, the employees have been instructed to assemble in one of two assembly points that are located east and west of the facility.

Assembly Area "A" is located in the parking lot at the corner of Lincoln Way (Old US Hwy 33) and Elk Park Drive

Assembly Area "B" is located in the parking lot at the corner of Lincoln Way (Old US Hwy 33) and 47th Street (CR 1)

Once assembled, a head count of the employees will be taken by their respective supervisors. The off-site emergency responders will be advised on any missing employees.

NO EMPLOYEE WILL BE ALLOWED TO ENTER THE FACILITY TO LOOK FOR MISSING EMPLOYEES.

Located adjacent to the main entrance on the south side of the plant is an information box, commonly referred to as a "Lock" box. Information contained within the Lock box includes an employee/shift list, a copy of the Site Emergency Response Plan, MSDS's for any Tier II chemicals and utilities disconnect locations. This information will be regularly updated by the President.

8.0 BOMB SCARE / WORKPLACE VIOLENCE

This procedure covers the steps to be taken in the event of a bomb scare and/or workplace violence that may endanger personnel.

PROCEDURE

- 1. The individual who receives the bomb threat or who observes potentially life threatening workplace violence shall immediately notify the President or Emergency Coordinator or next highest ranking employee in the office/plant who, in turn, will contact the local police department by dialing 911.
- 2. The President or highest ranking employee shall determine the need for evacuating the office and/or plant and, as determined necessary, shall initiate the office and/or plant evacuation procedure.
- 3. No person shall be permitted to conduct a bomb search or to physically confront any violent aggressor.
- 4. All personnel shall evacuate the plant and meet in the designated assembly area(s).



9.0 SEVERE WEATHER

This Procedure covers the steps to be taken in the event there is a threat of tornado and/or other severe weather that could jeopardize the safety or personnel.

- 1. The individual who receives notice of a severe weather threat shall immediately notify the President, an Emergency Coordinator, or the next highest-ranking employee in the office/plant who, as appropriate, will initiate action to secure the plant and protect the occupants.
- 2. Someone will be instructed to monitor the radio stations to determine the severity, location and path of the weather pattern. The main office has a NOAA certified weather station which will be monitored.
- 3. If the evacuation of the office/plant is necessary, personnel will follow the directions given by the Emergency Coordinator or the highest-ranking employee at VIM Recycling, Inc. Plant. Employees will exit the work areas calmly and orderly, and proceed to the designated shelter areas located inside the operations room of the main plant.
- 4. As determined by the President, Emergency Coordinator, or the next highest ranking employee, personnel who have not been assigned to secure the plant shall go to the shelter area to wait out the weather. Individuals who have been assigned to secure the plant shall complete their assignments and then shall go to the designated place(s) of refuge.

10.0 REQUIRED REPORTS

As required by 329 IAC 3.1-9-2 (4) and 327 IAC 2-6.1 any emergency that requires the implementation of Site Emergency Response Plan will be reported in writing within 15 days to the Indiana Department of Environmental Management. The incident report will include, at a minimum, the following information:

- A. Name, address, and telephone number of owner;
- B. Name, address, and telephone number of the facility;
- C. Date, time, and type (e.g., spill, fire or explosion) of the incident;
- D. Name and quantities of material(s) involved;
- E. The extent of injuries, if any;
- F. An assessment of actual or potential hazards to human health or the environment, where applicable;
- G. Estimate quantity and disposition of recovered material that resulted from the incident; and
- H. A narrative describing the known or suspected causes of the incident, and a statement describing measures taken to investigate the incident to determine the cause, and actions that can be taken to prevent this type of incident from reoccurring.

A copy of the incident report that is submitted to IDEM is required by the following agencies:

Jennifer Tobey
Elkhart County Emergency Management Agency
117 N. 2nd Street
Goshen, Indiana 46526
(574) 535-6590
emergencymangt@elkartcounty.com

The Elkhart County Health Department also requires reporting through a 'Spill Packet' which must be completed. The Spill Packet is found in Appendix C.

John Hulewicz Elkhart County Health Department Environmental Health Division 4230 Elkhart Road Goshen, Indiana 46526 (574) 875-3391

11.0 AMENDMENTS TO THE SITE EMERGENCY RESPONSE PLAN

The President will be notified of any changes in operations, or addition of new operations that require revision of an emergency action plan or an evacuation. The purpose of this notification is to revise the Site Emergency Response Plan and evaluate the goals for elimination or reduction of environmental threats.

- 1. The President will meet with the assistant plant manager.
- 2. The potential spills and environmental releases will be discussed and listed. This will include:
 - a. Chemicals to be used in new operation; note any that are not currently in use in the facility;
 - b. Physical hazards associated with the new operation, such as confined spaces, stored energy hazards (requiring lock out/tag out); and
 - c. Determination of most likely chemical or fire incidents to occur in the area.
- 3. Revise the Site Emergency Response Plan to reflect new risk evaluation. This will include:
 - a. Addition of new wastes/chemicals to the plan; and
 - b. Addition of special precautions or procedures.
- 4. The Site Emergency Response Plan will be revised whenever there is a change in the regulations; emergency coordinators or the emergency equipment list is changed.

All affected parties will be notified of the changes. If changes are minor, or are confined to appendices, an up-date to the current plan will be distributed. If the changes are major, the plan will be rewritten and distributed to all agencies and personnel identified in the plan.

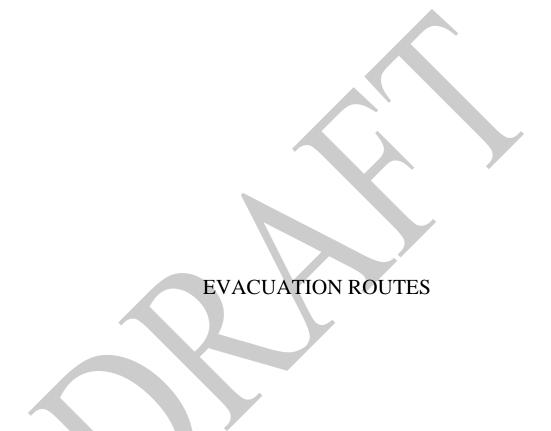
Appendix A.

MAPS

- 1. FACILITY LOCATION MAP
- 2. SITE PLAN AND FACILITY LAYOUT (Floor Plan)
- 3. EVACUATION ROUTES
- 4. HOSPITAL ROUTE

FACILITY LOCATION MAP

SITE PLAN AND FACILTY LAYOUT





Truck Route to Landfill

Appendix B.

EMERGENCY CONTACTS

VIM Recycling

Primary Emergency Coordinator:

Kenneth Will, President

22907 S.R. 120 East

Elkhart, Indiana 46516

Office: (574) 642-3677 Home: (574) 522-8553

Cell: (574) 320-6315 Nextel: 111*44*36315 kwill05@comcast.net

Alternate Coordinator #1:

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Alternate Coordinator #2:

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County

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John Hulewicz Elkhart County Health Department - Environmental Health Division 4230 Elkhart Road Goshen, Indiana 46526 Office: (574) 875-3391

Kim Davis, General Manager Elkhart County Landfill 59530 County Road 7 South Elkhart, Indiana 46517 Office: (574) 522-2581 countylf@verizon.net

City

Chief Timothy Graves
Baugo Fire Department
57955 County Road 3
Elkhart, Indiana 46517
Cell: (574) 320-1632
Station: (574) 293-0780
Tgraves_BTVFD@comcast.net

Tony Hartman, Director Elkhart General Hospital 600 East Boulevard Elkhart, Indiana 46514 Office: (574) 294-2621

Chas Taylor Elkhart City Fire Department - Hazardous Materials Team 500 East Street Elkhart, Indiana 46514 Station: (574) 293-8931

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Mr. John Bamber SunPro Services 23765 County Road 6 Elkhart, Indiana 46514 (574) 262-3556

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Appendix C.

ELKHART COUNTY SPILL PACKET

APPENDIX D.

REGULATORY NOTIFICATION FORM